

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SHEA DEVELOPMENT CORP., *et al.*,

Plaintiffs,

v.

CHRISTOPHER WATSON, *et al.*,

Defendants.

1:07-CV-11201 (DLC)

**MOTION TO ADMIT COUNSEL PRO HAC VICE**

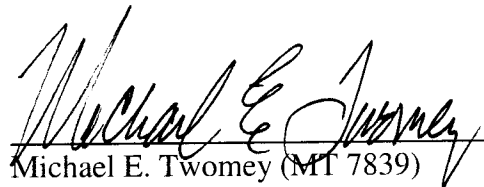
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael E. Twomey, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Monica McCarroll  
Firm Name: Williams Mullen, PC  
Address: 1021 East Cary Street, 17<sup>th</sup> Floor  
City/State/Zip: Richmond, Virginia 23219  
Phone Number: 804.643.1991  
Fax Number: 804.783.6507

Monica McCarroll is a member in good standing of the Bar of the Commonwealth of Virginia. There are no pending disciplinary proceedings against Monica McCarroll in any State or Federal court.

Dated: New York, NY  
June 24, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael E. Twomey", is written over a horizontal line.

Michael E. Twomey (MT 7839)  
Twomey, Hoppe & Gallanty, LLP  
757 Third Avenue  
New York, NY 10017  
Tel: 212-688-0400  
Fax: 212-688-1929

*Attorneys for Plaintiffs*

To:

James E. Davies, Esq.  
Landman Corsi Ballaine & Ford, PC  
120 Broadway, 27<sup>th</sup> Floor  
New York, NY 10271

*Attorneys for Defendant Christopher Watson*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHEA DEVELOPMENT CORP., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	1:07-CV-11201 (DLC)
	)	
CHRISTOPHER WATSON, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF MICHAEL E. TWOMEY IN  
SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

STATE OF NEW YORK     )  
COUNTY OF NEW YORK   ) ss.:

Michael E. Twomey, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Twomey, Hoppe & Gallanty, LLP, counsel for plaintiffs, Shea Development Corp., Bravera, Inc. and IP Holding of Nevada Corp. (the "Plaintiffs"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiffs' motion to admit Monica McCarroll as counsel pro hac vice to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1975. I also am admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have worked with Williams Mullen, a Richmond, Virginia, law firm, on other matters, including matters in this Court, for many years.

4. Monica McCarroll is a partner at Williams Mullen.

5. I have found Ms. McCarroll to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Monica McCarroll, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Monica McCarroll, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Monica McCarroll, pro hac vice, to represent Plaintiffs, Shea Development Corp., *et al.*, in the above captioned matter, be granted.

  
Michael E. Twomey (MT 7839)

Sworn to before me this  
24<sup>th</sup> day of June, 2008

  
Notary Public

1623567v1

GARY HOPPE  
Notary Public, State of New York  
No. 31-4754194  
Qualified in New York County  
Commission Expires July 31, 2009



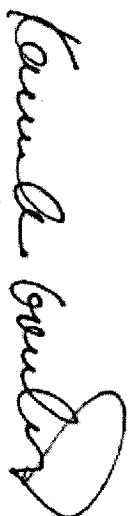
## VIRGINIA STATE BAR

### CERTIFICATE OF GOOD STANDING

*This is to certify that **MONICA McCARROLL** is an active member of the Virginia State Bar in good standing.*

***MS. McCARROLL** was licensed to practice law in Virginia on **OCTOBER 6, 2000**, after successfully passing the bar examination given by the Virginia Board of Bar Examiners.*

*Issued June 23, 2008*

  
Karen A. Gould  
Executive Director and  
Chief Operating Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SHEA DEVELOPMENT CORP., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	1:07-CV-11201 (DMC)
	)	
CHRISTOPHER WATSON, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

Upon the motion and affidavit of Michael E. Twomey, attorney for plaintiffs, Shea Development Corp., *et al.*, and sponsor attorney,

**IT IS HEREBY ORDERED** that

Applicant's Name: Monica McCarroll  
Firm Name: Williams Mullen, PC  
Address: 1021 East Cary Street, 17<sup>th</sup> Floor  
City/State/Zip: Richmond, Virginia 23219  
Phone Number: 804-643-1991  
Fax Number: 804-783-6507  
Email Address: sbaril@williamsmullen.com; mmccarroll@williamsmullen.com

is admitted to practice pro hac vice as counsel for plaintiffs, Shea Development Corp., *et al.*, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, NY  
June \_\_, 2008

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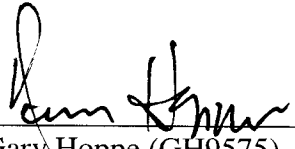
United States District/Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SHEA DEVELOPMENT CORP., et al., :  
 :  
 : Plaintiffs, : Affirmation Of Service  
 :  
 : - against - :  
 :  
 : CHRISTOPHER WATSON, et al., :  
 :  
 : Defendants. :  
-----X

Gary Hoppe, an attorney admitted to practice in the State of New York and before this Court, affirms under the penalty of perjury that on the 25<sup>th</sup> day of June 2008 he caused copies of the following papers: (1) Motion to Admit Stephen Baril Pro Hac Vice; (2) Affidavit of Michael Twomey in Support of Motion To Admit Stephen Baril Pro Hac Vice; (3) Proposed Order Admitting Stephen Baril Pro Hac Vice; (4) Motion to Admit Monica McCorrell Pro Hac Vice; (5) Affidavit of Michael Twomey in Support of Motion To Admit Monica McCorrell Pro Hac Vice; and (6) Proposed Order Admitting Monica McCorrell Pro Hac Vice, upon Landman, Corsi, Ballaine & Ford, P.C., attorneys for defendants, by United States mail, postage prepaid, at 120 Broadway, 27<sup>th</sup> Floor, New York, New York 10271, the address specified by said attorneys for said service.

Dated: New York, New York  
June 25, 2008

  
\_\_\_\_\_  
Gary Hoppe (GH9575)